IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

SENTIUS INTERNATIONAL, LLC, Plaintiff, v. BLACKBERRY LIMITED and BLACKBERRY CORPORATION, Defendants.	**CASE NO. 2:16-CV-773-JRG-RSP** **JURY TRIAL DEMANDED**

JOINT CLAIM CONSTRUCTION CHART

Pursuant to Local Patent Rule 4-5(d) and the Court's Docket Control Order, as amended on June 26, 2017 (Dkt. No. 70), Plaintiff Sentius International, LLC ("Sentius") and Defendants BlackBerry Limited and BlackBerry Corporation (collectively, "BlackBerry") respectfully submit this Joint Claim Construction Chart, attached hereto as Exhibit A.

Dated: July 21, 2017

Respectfully Submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this 21st day of July 2017.

/s/ Robert J. Yorio
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EXHIBIT A

Parties' Proposed Constructions for Claim Terms in
U.S. Patent Nos. RE40,731 (the "'731 patent") and RE43,633 (the "'633 patent")

'731 PATENT, CLAIM 95

Patent & Claim(s)	Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction	Court's Construction
'731 patent, Claim 95: A system for linking textual source material to external reference material for display, the system comprising: **means for determining a beginning position address of textual source material stored in an electronic database**;	"electronic database"	**[AGREED]**	**[AGREED]**	a collection of data within a given structure for accepting, storing and providing, on demand, data for at least one user
	"beginning position address"	beginning point location	beginning memory location	
	"means for determining a beginning position address of textual source material stored in an electronic database"	Function: **[AGREED]** Structure: a processor programmed to perform the step of assigning a character position for the first character of a given set of text within an open text file, and equivalents thereof.	Function: **[AGREED]** Structure: This claim is indefinite under 35 U.S.C. § 112 ¶ 2 and ¶ 6 because the specification does not sufficiently disclose an algorithm to perform the function associated with this limitation.	Function: determining a beginning position address of textual source material stored in an electronic database Structure:

Patent & Claim(s)	Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction	Court's Construction
means for cutting the textual source material into a plurality of discrete pieces;	**"**means for cutting the textual source material into a plurality of discrete pieces"	Function: **[AGREED]** Structure: a processor programmed to perform the step of parsing the given set of text into individual words, and equivalents thereof.	Function: **[AGREED]** Structure: This claim is indefinite under 35 U.S.C. § 112 ¶ 2 and ¶ 6 because the specification does not sufficiently disclose an algorithm to perform the function associated with this limitation.	Function: cutting the textual source material into a plurality of discrete pieces Structure:
means for determining a starting point address and an ending point address of at least one of the plurality of discrete pieces based upon the beginning	"starting point address"	**[AGREED]**	**[AGREED**	an offset value from the beginning position address to the starting point
	"ending point address"	**[AGREED]**	**[AGREED**	an offset value from the beginning position address to the ending

Patent & Claim(s)	Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction	Court's Construction
position address;	"means for determining a starting point address and an ending point address of at least one of the plurality of discrete pieces based upon the beginning position address"	Function: **[AGREED]** Structure: a processor programmed to perform the step of identifying, for any given words in the file to be linked, their starting and ending character positions offset from the first character position, and equivalents thereof.	Function: **[AGREED]** Structure: This claim is indefinite under 35 U.S.C. § 112 ¶ 2 and ¶ 6 because the specification does not sufficiently disclose an algorithm to perform the function associated with this limitation.	Function: determining a starting point address and an ending point address of at least one of the plurality of discrete pieces based upon the beginning position address Structure:
means for recording in a look-up table the starting and ending	"look-up table"	**[AGREED]**	**[AGREED**	an array or matrix of data that contains values for searching

Patent & Claim(s)	Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction	Court's Construction
point addresses;	"means for recording in a look-up table the starting and ending point addresses"	Not MPF. Alternatively, Function: **[AGREED** Structure: a processor storing the identified offset values in a data structure, and equivalents thereof.	Governed by § 112 ¶ 6. Function: **[AGREED]** Structure: "a personal computer" programmed to record in a look-up table the starting and ending point addresses of the plurality of discrete pieces (4:7-8)	Function: recording in a look-up table the starting and ending point addresses Structure:
means for linking at least one of the plurality of discrete pieces to at least one of a plurality	"link"	a pointer to data or information or the location of data or information	a pointer to data or information, or a pointer to the location of data or information	

Patent & Claim(s)	Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction	Court's Construction
of external reference materials by recording in the look-up table, along with the starting and ending point addresses of the at least one of the plurality of discrete pieces, a link to the at least one of the plurality of external reference materials, the plurality of external reference materials comprising any of textual, audio, video, and picture information;	"means for linking at least one of the plurality of discrete pieces to at least one of a plurality of external reference materials by recording in the look-up table, along with the starting and ending point addresses of the at least one of the plurality of discrete pieces, a link to the at least one of the plurality of external reference materials"	Not MPF. Alternatively, Function: recording in the look-up table a link to at least one external reference material Structure: a processor storing a pointer in the data structure for a given offset value range that points the system to at least one corresponding external reference material for that offset value range, and equivalents thereof.	Governed by § 112 ¶ 6. Function: linking at least one of the plurality of discrete pieces to at least one of a plurality of external reference materials by recording in the look-up table, along with the starting and ending point addresses of the at least one of the plurality of discrete pieces, a link to the at least one of the plurality of external reference materials Structure: "a personal computer" programmed to record in the look-up table, along with the starting and ending point addresses of the at least one of the plurality of discrete pieces, a link to the at least one of the plurality of external reference materials (4:7-8)	

Patent & Claim(s)	Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction	Court's Construction
means for displaying an image of the textual source material;	"means for displaying an image of the textual source material"	Not MPF. Alternatively, Function: **[AGREED]** Structure: a processor displaying a portion of a text file, i.e., creating a view of the textual source material to be displayed on an electronic display, and equivalents thereof.	Governed by § 112 ¶ 6. Function: **[AGREED]** Structure: "personal computer" and "electronic display of a personal computer" (4:7-8)	Function: displaying an image of the textual source material Structure:

Patent & Claim(s)	Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction	Court's Construction
means for selecting a discrete portion of the displayed textual source material image;	"means for selecting a discrete portion of the displayed textual source material image"	Not MPF. Alternatively, Function: **[AGREED]** Structure: a processor determining the location on a display where a user input was received, and equivalents thereof.	Governed by § 112 ¶ 6. Function: **[AGREED]** Structure: a "pointing device, such as a mouse (200)" (6:50-51, 4:15-22); an "electronic display of a personal computer" (4:7-8); and a "personal computer" (4:7-8)	Function: selecting a discrete portion of the displayed textual source material image Structure:
means for determining a display address of the	"display address"	display location	a pixel location or screen coordinates on a display	

Patent & Claim(s)	Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction	Court's Construction
selected discrete portion;	"means for determining a display address of the selected discrete portion"	Not MPF. Alternatively, Function: **[AGREED]** Structure: a processor determining the display coordinates of the user input, and equivalents thereof.	Governed by § 112 ¶ 6. Function: **[AGREED]** Structure: This claim is indefinite under 35 U.S.C. § 112 ¶ 2 and ¶ 6 because the specification does not sufficiently disclose an algorithm to perform the function associated with this limitation.	Function: determining a display address of the selected discrete portion Structure:
means for converting the display address of the selected discrete portion to an offset	"offset value"	a position relative to a starting point	the distance from a starting point, either the start of a file or the start of a memory location	

Patent & Claim(s)	Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction	Court's Construction
value from the beginning position address;	"means for converting the display address of the selected discrete portion to an offset value from the beginning position address"	Function: **[AGREED]** Structure: a processor programmed to perform the step of determining the offset value of the display location where the user input was received based upon an offset index, and equivalents thereof	Function: **[AGREED]** Structure: This claim is indefinite under 35 U.S.C. § 112 ¶ 2 and ¶ 6 because the specification does not sufficiently disclose an algorithm to perform the function associated with this limitation.	Function: converting the display address of the selected discrete portion to an offset value from the beginning position address Structure:

Patent & Claim(s)	Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction	Court's Construction
means for comparing the offset value with the starting and ending point addresses recorded in the look-up table to identify one of the plurality of discrete pieces;	"means for comparing the offset value with the starting and ending point addresses recorded in the look-up table to identify one of the plurality of discrete pieces"	Function: **[AGREED]** Structure: a processor programmed to perform the step of matching the identified offset value with one of the offset value ranges stored in the data structure, and equivalents thereof.	Function: **[AGREED]** Structure: a "personal computer" (4:7-8) programmed to determine whether the offset value falls between the starting and ending point addresses for the plurality of discrete pieces of textual source material stored in the look-up table to identify one of the plurality of discrete pieces of textual source material as a match when the offset value falls between that discrete piece's starting and ending point addresses. (6:55-65; 7:45-49).	Function: comparing the offset value with the starting and ending point addresses recorded in the look-up table to identify one of the plurality of discrete pieces Structure:

Patent & Claim(s)	Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction	Court's Construction
means for selecting one of the plurality of external reference materials corresponding to the identified one of the plurality of discrete pieces;	"means for selecting one of the plurality of external reference materials corresponding to the identified one of the plurality of discrete pieces"	Function: selecting one of the plurality of external reference materials corresponding to the identified one of the plurality of discrete pieces Structure: a processor programmed to perform the step of using the pointer for the matched offset value range to identify a corresponding external reference material, and equivalents thereof.	Function: Indefinite Structure: This claim is also indefinite under 35 U.S.C. § 112 ¶ 2 and ¶ 6 because the specification does not sufficiently disclose an algorithm to perform the function associated with this limitation.	Function: Structure:
means for retrieving the selected one of the plurality of external reference materials using a recorded link to the selected one of the plurality of external reference materials; and	"means for retrieving the selected one of the plurality of external reference materials using a recorded link to the selected one of the plurality of external reference materials"	Function: **[AGREED]** Structure: a processor programmed to perform the step of using the pointer for the matched offset value range to	Function: **[AGREED]** Structure: a "personal computer" programmed to retrieve the selected one of the plurality of external reference	Function: retrieving the selected one of the plurality of external reference materials using a recorded link to the selected one of the plurality of external reference materials Structure:

Patent & Claim(s)	Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction	Court's Construction
		obtain the identified corresponding external reference material, and equivalents thereof.	materials using a recorded link to the selected one of the plurality of external reference materials (4:7-8).	
means for displaying the retrieved external reference material.	"means for displaying the retrieved external reference material"	Not MPF. Alternatively, Function: **[AGREED]** Structure: a processor displaying the obtained reference material, i.e., creating a view of the selected external reference material to be displayed on an electronic display, and equivalents thereof	Governed by § 112 ¶ 6. Function: **[AGREED]** Structure: "personal computer" (4:7-8) and "electronic display of a personal computer" (4:7-8)	Function: displaying the retrieved external reference material Structure:

’633 PATENT, CLAIM 17

Patent & Claim(s)	Term	Plaintiff’s Proposed Construction	Defendants’ Proposed Construction	Court’s Construction
’633 patent, Claim 17: A system for linking textual source material to external reference materials for display, the system comprising: **means for determining a <u>beginning position address</u> of textual source material stored in an <u>electronic database</u>;**	“electronic database”	**[AGREED]**	**[AGREED]**	a collection of data within a given structure for accepting, storing and providing, on demand, data for at least one user
	“beginning position address”	beginning point location	beginning memory location	
	“means for determining a beginning position address of textual source material stored in an electronic database”	<u>Function</u>: **[AGREED]** <u>Structure</u>: a processor programmed to perform the step of assigning a character position for the first character of a given set of text within an open text file, and equivalents thereof.	<u>Function</u>: **[AGREED]** <u>Structure</u>: This claim is indefinite under 35 U.S.C. § 112 ¶ 2 and ¶ 6 because the specification does not sufficiently disclose an algorithm to perform the function associated with this limitation.	<u>Function</u>: determining a beginning position address of textual source material stored in an electronic database <u>Structure</u>:

Patent & Claim(s)	Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction	Court's Construction
means for cutting the textual source material into a plurality of discrete pieces;	**"**means for cutting the textual source material into a plurality of discrete pieces"	Function: **[AGREED]** Structure: a processor programmed to perform the step of parsing the given set of text into individual words, and equivalents thereof.	Function: **[AGREED]** Structure: This claim is indefinite under 35 U.S.C. § 112 ¶ 2 and ¶ 6 because the specification does not sufficiently disclose an algorithm to perform the function associated with this limitation.	Function: cutting the textual source material into a plurality of discrete pieces Structure:
means for determining starting point addresses and ending point addresses of the plurality of discrete pieces based upon the beginning position	"starting point address"	**[AGREED]**	**[AGREED**	an offset value from the beginning position address to the starting point
	"ending point address"	**[AGREED]**	**[AGREED**	an offset value from the beginning position address to the ending

Patent & Claim(s)	Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction	Court's Construction
address;	"means for determining starting point addresses and ending point addresses of the plurality of discrete pieces based upon the beginning position address;"	Function: determining a starting point address and an ending point address of at least one of the plurality of discrete pieces based upon the beginning position address. Structure: a processor programmed to perform the step of identifying, for any given words in the file to be linked, their starting and ending character positions offset from the first character position, and equivalents thereof.	Function: determining starting point addresses and ending point addresses of the plurality of discrete pieces based upon the beginning position address Structure: This claim is indefinite under 35 U.S.C. § 112 ¶ 2 and ¶ 6 because the specification does not sufficiently disclose an algorithm to perform the function associated with this limitation.	Function: Structure:
means for recording in a look-up table the starting and ending	"look-up table"	**[AGREED]**	**[AGREED**	an array or matrix of data that contains values for searching

Patent & Claim(s)	Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction	Court's Construction
point addresses;	"means for recording in a look-up table the starting and ending point addresses"	Not MPF. Alternatively, Function: **[AGREED]** Structure: a processor storing the identified offset values in a data structure, and equivalents thereof.	Governed by § 112 ¶ 6. Function: **[AGREED]** Structure: "a personal computer" programmed to record in a look-up table the starting and ending point addresses of the plurality of discrete pieces (4:7-8)	Function: recording in a look-up table the starting and ending point addresses Structure:
means for linking the plurality of discrete pieces to external reference materials by	"link"	a pointer to data or information or the location of data or information	a pointer to data or information, or a pointer to the location of data or information	

Patent & Claim(s)	Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction	Court's Construction
recording in the look-up table, along with the starting and ending point addresses of the plurality of discrete pieces, links to the external reference materials, the external reference materials comprising any of textual, audio, video, and picture information;	"means for linking the plurality of discrete pieces to external reference materials by recording in the look-up table, along with the starting and ending point addresses of the plurality of discrete pieces, links to the external reference materials"	Not MPF. Alternatively, Function: recording in the look-up table a link to at least one external reference material Structure: a processor storing a pointer in the data structure for a given offset value range that points the system to at least one corresponding external reference material for that offset value range, and equivalents thereof.	Governed by § 112 ¶ 6. Function: linking the plurality of discrete pieces to external reference materials by recording in the look-up table, along with the starting and ending point addresses of the plurality of discrete pieces, links to the external reference materials Structure: "a personal computer" programmed to record in the look-up table, along with the starting and ending point addresses of the at least one of the plurality of discrete pieces, a link to the at least one of the plurality of external reference materials (4:7-8)	Function: Structure:

Patent & Claim(s)	Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction	Court's Construction
means for selecting a discrete portion of an image of the source material;	"means for selecting a discrete portion of an image of the source material"	Not MPF. Alternatively, Function: **[AGREED** Structure: a processor determining the location on a display where a user input was received, and equivalents thereof.	Governed by § 112 ¶ 6. Function: **[AGREED]** Structure: a "pointing device, such as a mouse (200)" (6:50-51, 4:15-22); an "electronic display of a personal computer" (4:7-8); and a "personal computer" (4:7-8)	Function: selecting a discrete portion of an image of the source material Structure:
means for determining a display address of the	"display address"	display location	a pixel location or screen coordinates on a display	

Patent & Claim(s)	Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction	Court's Construction
selected discrete portion;	"means for determining a display address of the selected discrete portion"	Not MPF. Alternatively, Function: **[AGREED]** Structure: a processor determining the display coordinates of the user input, and equivalents thereof.	Governed by § 112 ¶ 6. Function: **[AGREED]** Structure: This claim is indefinite under 35 U.S.C. § 112 ¶ 2 and ¶ 6 because the specification does not sufficiently disclose an algorithm to perform the function associated with this limitation.	Function: determining a display address of the selected discrete portion Structure:
means for converting the display address of the selected discrete portion to an offset	"offset value"	a position relative to a starting point	the distance from a starting point, either the start of a file or the start of a memory location	

Patent & Claim(s)	Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction	Court's Construction
value from the beginning position address;	"means for converting the display address of the selected discrete portion to an offset value from the beginning position address"	Function: **[AGREED]** Structure: a processor programmed to perform the step of determining the offset value of the display location where the user input was received based upon an offset index, and equivalents thereof.	Function: **[AGREED]** Structure: This claim is indefinite under 35 U.S.C. § 112 ¶ 2 and ¶ 6 because the specification does not sufficiently disclose an algorithm to perform the function associated with this limitation.	Function: converting the display address of the selected discrete portion to an offset value from the beginning position address Structure:

Patent & Claim(s)	Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction	Court's Construction
means for comparing the offset value with the starting and ending point addresses recorded in the look-up table to identify one of the plurality of discrete pieces;	"means for comparing the offset value with the starting and ending point addresses recorded in the look-up table to identify one of the plurality of discrete pieces"	Function: **[AGREED]** Structure: a processor programmed to perform the step of matching the identified offset value with one of the offset value ranges stored in the data structure, and equivalents thereof.	Function: **[AGREED]** Structure: a "personal computer" (4:7-8) programmed to determine whether the offset value falls between the starting and ending point addresses for the plurality of discrete pieces of textual source material stored in the look-up table to identify one of the plurality of discrete pieces of textual source material as a match when the offset value falls between that discrete piece's starting and ending point addresses. (6:55-65; 7:45-49).	Function: comparing the offset value with the starting and ending point addresses recorded in the look-up table to identify one of the plurality of discrete pieces Structure:

Patent & Claim(s)	Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction	Court's Construction
means for selecting one of the external reference materials corresponding to the identified one of the plurality of discrete pieces;	"means for selecting one of the external reference materials corresponding to the identified one of the plurality of discrete pieces"	Function: selecting one of the external reference materials corresponding to the identified one of the plurality of discrete pieces Structure: a processor programmed to perform the step of using the pointer for the matched offset value range to identify a corresponding external reference material, and equivalents thereof.	Function: Indefinite Structure: This claim is also indefinite under 35 U.S.C. § 112 ¶ 2 and ¶ 6 because the specification does not sufficiently disclose an algorithm to perform the function associated with this limitation.	Function: Structure:

Patent & Claim(s)	Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction	Court's Construction
means for displaying on a computer the selected one of the external reference materials.	"means for displaying on a computer the selected one of the external reference materials"	Not MPF. Alternatively, <u>Function</u>: displaying on a computer the retrieved external reference material <u>Structure</u>: a processor displaying the obtained reference material, i.e., creating a view of the selected external reference material to be displayed on an electronic display, and equivalents thereof.	Governed by § 112 ¶ 6. <u>Function</u>: displaying on a computer the selected one of the external reference materials <u>Structure</u>: "personal computer" (4:7-8) and "electronic display of a personal computer" (4:7-8)	<u>Function</u>: <u>Structure</u>: